

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

2014 Annual 64.2009(e) CPNI Certification covering the prior calendar year 2013

Name of companies covered by this certification:	Form 499 Filer ID:
Critical Alert Systems, LLC (f/k/a NEP, LLC)	812595
TeleTouch Paging, LP	826262

Name of signatory: Perri A. McNaught

Title of signatory: Executive Vice President

I, Perri A. McNaught, certify that I am an officer of the companies named above (the "Companies"), and acting as an agent of the Companies, that I have personal knowledge that the Companies have established operating procedures that, to the best of my knowledge, information and belief, are adequate to ensure compliance with the Commission's CPNI rules as I understand them. *See* 47 C.F.R. § 64.2001 *et seq.* The basis for my certification is summarized below:

The paging and critical messaging services provided by the Companies are billed to the customer monthly on a flat-rate basis. As a result, the Companies collect at most only minimal information that could be considered CPNI under the FCC's rules. Any use or disclosure of or provision of access to customer-specific information by the Companies, whether CPNI or not, requires my approval.

The Companies use, disclose or provide access to CPNI only for the purpose of initiating, rendering, billing or collecting for the paging and critical messaging services provided by the Companies. There are two circumstances under which the Companies may disclose CPNI to third party vendors as an incident of providing their paging and critical messaging services: (1) to the company that provides the customer billing software and system, and (2) to the company that physically prints the Companies' customer bills. In both cases the Companies require these third party vendors to observe the Companies' CPNI obligations and to limit their use of CPNI solely to the purpose for which they are permitted access. The Companies also disclose CPNI to law enforcement personnel in compliance with subpoenas.

Except as described in the preceding paragraph, the Companies do not disclose or provide access to CPNI to any third parties for any purpose.

The Companies do not employ any third parties to market paging or critical messaging service on their behalf. To the extent any marketing of the Companies' paging or critical messaging services is done, it is done through direct sales by one or more employees of the Companies. Such employees may maintain customer account information for customer service

purposes and for the purpose of selling additions to services already subscribed to by customers, or adjuncts to basic services already subscribed to by the customers.

The Companies have reviewed and modified their CPNI policies and practices as deemed necessary in order to comply with the CPNI rule changes adopted by the FCC in 2007.

The Companies did not take any actions against data brokers (*i.e.*, institute proceedings or file petitions at either state commissions, the court system, or at the FCC) during 2013.

The Companies did not have any incidents of "pretexting" during 2013.

The Companies did not receive any customer complaints during 2013 concerning the unauthorized release of CPNI.

The Companies represent and warrant that the above certification is consistent with 47 C.F.R. §1.17, which requires truthful and accurate statements to the FCC. The Companies also acknowledge that false statements and misrepresentations to the FCC are punishable under Title 18 of the U.S. Code and may subject them to enforcement action.



Perri A. McNaught

Date: _____

2/21/14